

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
SAVANNAH DIVISION

J.S.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	CIVIL ACTION FILE NUMBER:
	)	4:24-CV-00240-RSB-CLR
KISHANVB HOSPITALITY, LLC d/b/a	)	
MOTEL 6 HINESVILLE,	)	
	)	
Defendant.	)	
_____	)	

**DEFENDANT KISHANVB HOSPITALITY, LLC’S RESPONSE TO PLAINTIFF’S  
MOTION FOR PROTECTIVE ORDER AND LEAVE TO PROCEED VIA INITIALS  
WITH BRIEF IN SUPPORT THEREOF**

COMES NOW, Defendant Kishanvb Hospitality, LLC (“Kishanvb”) and responds to Plaintiff’s Motion for Protective Order and Leave to Proceed Via Initials with Brief in Support Thereof, showing the Court as follows:

Plaintiff makes very serious and inflammatory allegations against Defendant, including allegations that Defendant knowingly permitted, and indeed benefitted from, Plaintiff performing sex acts at its property—which Defendant vehemently denies. In fact, in an effort to present inflammatory allegations, Plaintiff includes allegations in her complaint that are patently false and incapable of being proven. But she brings these allegations anonymously naming a family-owned business by name, with the likely outcome of permanently and irrevocably harming it.

At this time, Defendant has not been provided with evidence sufficient to support a finding that Plaintiff’s “privacy interest outweighs the public’s interest in open court proceedings,” and notes, unlike the case cited in Plaintiff’s brief, that the allegations do not involve “leud sexual acts prior to [her] eighteenth birthday [Doc. 2, p. 3].” In fact, according to the Complaint, Plaintiff was an adult at all times relevant to the allegations in the Complaint. [Doc. 1, ¶ 2].

Nevertheless, in an effort to move forward cooperatively, Defendant does not oppose proceeding initially using only Plaintiff's initials in documents filed with the Court. Defendant, however, opposes any restrictions on conducting discovery using Plaintiff's full name, date of birth, and other identifying information in order to obtain records from parties and non-parties. Limiting the use of this identifying information would substantially hinder Defendant's right to conduct broad discovery and defend itself in this case.

Further, as highlighted in this Court's Order Directing Defendant to Respond to Plaintiff's Motion for Protective Order [Doc. 7], Defendant anticipates the discovery of additional information that should be considered in weighing the factors as to Plaintiff's right to privacy and whether her anonymity poses a "threat of fundamental unfairness to the defendant." Defendant anticipates that it may need to revisit this issue depending on the information that is learned in discovery, including other potential claims and non-party discovery.

Pending further Order from this Court regarding Plaintiff's concerns for privacy and safety and the potential prejudice to this Defendant, Defendant agrees to redact personal identifying information from documents filed with the Court and agrees that Plaintiff's initials may be substituted for her full name in deposition transcripts.

This 25<sup>th</sup> day of November 2024.

**FREEMAN MATHIS & GARY, LLP**

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**CERTIFICATE OF E-SERVICE**

I hereby certify that I have this day electronically submitted the foregoing to the Clerk of Court using the Court's electronic filing system which will automatically send electronic mail notification of such filing to the following counsel of record:

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This 25<sup>th</sup> day of November 2024.

**FREEMAN MATHIS & GARY, LLP**

/s/ Sharon P. Horne  
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*Attorney for Defendant*